

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

DONALD and MARY THORNTON, )  
Plaintiffs, )  
vs. ) Case No.: 2:06-cv-1072  
ROLLIN VAUGHN SOWARDS and, )  
PROGRESSIVE INSURANCE CO., )  
Defendants.

**MOTION FOR EXTENSION OF TIME TO FILE  
JOINT STIPULATION FOR DISMISSAL**

COMES NOW THE DEFENDANT, Rollin Vaughn Sowards, and respectfully requests this Court to GRANT its Motion for Extension of Time to File Joint Stipulation for Dismissal, stating as follows:

1. Per the Court's Order, this Defendant was required to file its Joint Stipulation for Dismissal no later than March 27, 2008.
2. As such, this Defendant now respectfully requests this Court to grant its Motion for Extension of Time to File Joint Stipulation for Dismissal, by 60 days.
3. This Defendant states that the adjuster handling this file has been reassigned and as such, the new adjuster is in the process of ordering and forwarding the settlement check.
4. This Defendant states that no party will be prejudiced by this Extension.

WHEREFORE ALL PREMISES CONSIDERED, the Defendant, Rollin Vaughn Sowards, hereby respectfully requests this Court to GRANT its Motion for Leave to Amend Defendant's Notice of Removal.

RESPECTFULLY SUBMITTED this the 30<sup>th</sup> day of April, 2008.

/s/ Richard E. Crum, Esq.  
Richard E. Crum, Esq.

Attorney for Defendant,  
Rollin Vaughn Sowards

Of Counsel:  
**SHEALY, CRUM & PIKE, P.C.**  
Post Office Box 6346  
Dothan, Alabama 36302-6346  
(334) 677-3000

**CERTIFICATE OF SERVICE**

I hereby certify I have this date served a copy of the foregoing either via PACER electronic filing system, or via U.S. mail, postage prepaid and properly addressed upon the following:

William B. Alverson, Jr., Esq.  
ALBRITTONS, CLIFTON, ALVERSON  
MOODY, & BOWDEN, P.C.  
Post Office Drawer 880  
Andalusia, Alabama 36420

DONE THIS the 30<sup>th</sup> day of April, 2008.

/s/ Richard E. Crum, Esq.  
Of Counsel